



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, Ohio 43402
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George V. Voinovich
Governor

RECEIVED

SEP 11 1996

AIR ENFORCEMENT BRANCH,
U. S. EPA, REGION 5

Re: Fulton County
Kurdziel Iron
0326000017
Notice of Violation

September 6, 1996

CERTIFIED MAIL

Kurdziel Industries, Inc.
801 West Norton Avenue #300
Muskegon, Michigan, 49441-4180
Attn: Allen Alexander

Dear Mr Alexander:

This letter shall serve as written confirmation of the issues discussed at the August 22, 1996, inspection/meeting with yourself, Don Waltermeyer and this writer. Our points of concern are as follows:

1. Since the above referenced facility was acquired by Kurdziel Industries in 1989, multiple violations have occurred which include the following:
 - a. failure to obtain Permits to Install (PTI) in violation of OAC rule 3745-31-02 for the mold coating operation, the cupola and the arc lancing operation;
 - b. failure to obtain Permits to Operate (PTO) in violation of OAC rule 3745-35-02 for the above referenced emission units as well as the pouring & cooling, material handling operations (in the pouring & cooling area), and the roadways and parking areas;
 - c. excessive emissions from fugitive dust sources; and
 - d. numerous instances of failure to report the malfunctions of air pollution control equipment in violation of OAC rule 3745-15-06.
2. To date, attempts to reduce emissions to the point of eliminating complaints have been unsuccessful. Complaints which we feel are justified are still being received about the operations at this facility. The typical complaint cites both dust and odor problems.
3. Based on the number of residents complaining and numerous inspections and observations by the OEPA, we believe that emissions from this facility are contributing to a public nuisance in violation of OAC rule 3745-15-07. This office has decided to pursue an enforcement action against Kurdziel Industries. This matter will be referred to our legal section in the central office.



The OEPA, DAPC further believes that the complaints about this facility pertaining to air contaminant emissions are a combination of uncontrolled fugitive emissions units and poorly maintained control devices on point sources. The following actions need to be taken to correct these violations:

1. A compliance test on the scrubber controlling the cupola should be performed as soon as practical. The OEPA will wave the 30 day notification requirement for this test. On other controlled emission units, this office may request additional emissions tests if it is deemed practical and necessary.

The estimated uncontrolled mass rate of emissions (UMRE) for the cupola is based on a poorly rated AP-42 emission factor. It may be necessary to perform an inlet/outlet test to determine the actual UMRE.

2. The OEPA has determined that the pouring/cooling and the subsequent mold/sand handling operations in the mold pouring area at this facility are significant fugitive dust emission units that are currently uncontrolled except for partial building enclosure. Excessive fugitive particulate matter emissions are escaping the building. The company should submit a comprehensive fugitive dust control plan that will bring these units into compliance with the fugitive dust control requirements in OAC rules 3745-17-07(B) and 3745-17-08. The plan should include the following milestones:

Milestone Dates

1. Submit plan to achieve compliance by: _____
2. Award contracts for emission control system or process modifications; or, issue orders for the purchase of component parts to accomplish emission control or process modification by: _____
3. Initiate on-site construction or installation of emission control equipment or process change by: _____
4. Complete on-site construction or installation of emission control equipment or process change by: _____
5. Achieve final compliance by: _____

Mr. Allen Alexander
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3. It will be necessary to update the preventative maintenance and malfunction abatement plan that was submitted on February 29, 1996, to include all control devices/measures at this facility. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.

Should you have any questions or comments, contact this office at the above address or call (419) 373-3131.

Sincerely,



Mark Barber
Division of Air Pollution Control

/llr

pc: Ed Hammet, NWDO
Dapc-NWDO File
Lisa Holscher, USEPA
Jerry Matheny, City of Wauseon

